

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION  
BUREAU, *et al.*,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), *et al.*,

Defendants, and

STRATEGIC ESOP, *et al.*,

Relief Defendants.

**CASE NO. 24-cv-40 EAW-MJR**

**MOTION FOR TEMPORARY STAY  
OF PLAINTIFF CFPB'S  
DEADLINES**

Plaintiff the Consumer Financial Protection Bureau (CFPB) respectfully submits this motion requesting a temporary stay to inform the Court of developments relevant to this litigation. On January 31, 2025, President Trump designated Secretary of the Treasury Scott Bessent as Acting Director of the CFPB.

To promote consistency with the goals of the new Administration, Acting Director Bessent directed Bureau counsel on February 3, 2025, not to making any filings or appearances in litigation except to seek a pause in proceedings. Accordingly, the CFPB requests a temporary stay of the following deadlines requiring action by the CFPB:

- today's deadline to respond to the Joint Objections to Report and Recommendation on Motion to Dismiss filed by Defendant Fidelis Legal Support Services, LLC, and Relief Defendants Cameron Christo and the Bush Lake Trust (*see* Dkt. 556); and

- the February 10, 2025 deadline for post-hearing briefing in connection with the evidentiary hearing held by Magistrate Judge Roemer on January 23-24, 2025 (*see* Dkt. 590).

Due to these extraordinary circumstances, and to avoid prejudice to the CFPB, there is good cause to stay the CFPB's upcoming deadlines in this matter. The CFPB's counsel will provide a further update to the Court and counsel for the parties as soon as practicable.

DATED: February 4, 2025

Respectfully submitted,

Attorneys for Plaintiff  
Consumer Financial Protection Bureau

ERIC HALPERIN  
Enforcement Director

RICHA SHYAM DASGUPTA  
Deputy Enforcement Director

TIMOTHY M. BELSAN  
Assistant Litigation Deputy

/s/ Vanessa Buchko  
Vanessa Buchko  
E-mail: [vanessa.buchko@cfpb.gov](mailto:vanessa.buchko@cfpb.gov)  
Phone: (202) 435-9593  
Joseph Sanders  
E-mail: [joseph.sanders@cfpb.gov](mailto:joseph.sanders@cfpb.gov)  
Phone: (202) 377-9846  
Akash Desai  
E-mail: [akash.desai@cfpb.gov](mailto:akash.desai@cfpb.gov)  
Phone: (681) 507-1800  
Nicole Cabanez  
E-mail: [nicole.cabanez@cfpb.gov](mailto:nicole.cabanez@cfpb.gov)  
Phone: (202) 445-5479  
1700 G Street, NW  
Washington, DC 20552  
Facsimile: (202) 435-7722